

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 24-CR-00198-SRB

DELEON REED,
Defendant.

MOTION TO CONTINUE TRIAL

COMES NOW defendant Deleon Reed, by and through counsel, Laura E. O'Sullivan, and respectfully requests this Court to continue the trial of this matter currently set for June 2, 2025, to the September 15, 2025, trial docket. Mr. Reed offers the following in support:

1. On September 10, 2024, an Indictment was filed charging Mr. Reed. Mr. Reed is charged with one count of felon in possession of a firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8), and one count of possession of a machinegun in violation of 18 U.S.C. §§ 922(o) and 924(a)(2). Doc. 1.
2. Mr. Reed was already detained as a result of supervised release violation allegations in 18-CR-00038. Mr. Reed remains in custody in both matters.
3. The Court appointed undersigned counsel in this matter on September 11, 2024. Doc. 3.
4. On September 18, 2024, Mr. Reed appeared before United States Magistrate Judge Lajuana M. Counts for his arraignment and detention hearing. The Court granted the government's motion for pretrial detention finding Mr. Reed ineligible for release on

bail. Mr. Reed was remanded to the custody of the U.S. Marshal. The case was originally set to commence on the joint criminal jury trial docket of October 21, 2024. Undersigned counsel orally requested a continuance, and the Court set this matter on the joint criminal jury trial docket commencing January 6, 2025. Doc. 5.

5. On November 21, 2024, counsel requested a continuance of the January trial date. Doc. 10. The Court continued the trial to June 2, 2025. Doc. 12.
6. Counsel has been communicating with Ms. Ragner in an attempt to move this matter toward disposition. Both Ms. Ragner and counsel agree that additional time is necessary to resolve this matter.
7. On its face, this case may not appear to be a complicated matter; however, this case and the allegations in 18-CR-00038 are intertwined and complicate the issues in both matters.
8. Mr. Reed and undersigned counsel require additional time to review the discovery, adequately investigate and prepare for trial, or seek other resolution. The defense cannot reasonably be ready for trial by June 2, 2025.
9. Additionally, counsel needs additional time to prepare and file pretrial motions. Counsel filed a Motion for Extension of Time to file Pre-Trial Motions on February 24, 2025. Doc. 15. If this motion is granted, the trial date would need to be continued in order to accommodate the litigation schedule for these motions.
10. Undersigned counsel contacted Ashleigh Ragner, Assistant United States Attorney, and she does not object to a continuance.
11. On February 27, 2025, Mr. Reed was advised of his Speedy Trial rights and consented to this continuance request.

12. This continuance is not sought for the purpose of dilatory delay but is sought in truth and fact that Mr. Reed may be afforded due process of law under the Fifth Amendment to the United States Constitution and afforded effective assistance of counsel under the Sixth Amendment to the United States Constitution. In accordance with 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), it is submitted that the above stated reasons for a continuance outweigh the best interest of the public and the defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1).

13. Under the provisions of 18 U.S.C. § 3161(h)(8)(A), the period of time until the next criminal trial docket should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial Act.

WHEREFORE Mr. Reed respectfully requests this Court to remove this case from the June 2, 2025, trial docket, and to continue this case to the September 15, 2025, trial docket, and for such other relief this Court deems just and proper.

Respectfully Submitted,
SANDAGE LAW, LLC.

/s/ Laura O'Sullivan
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Attorney for Defendant

CERTIFICATE OF SERVICE

On February 28, 2025, I served this document by depositing an electronic copy of it in the Court's CM/ECF system, which shall distribute notice to all attorneys of record.

/s/ Laura O'Sullivan
Laura O'Sullivan